

UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF MICHIGAN

UNITED STATES OF AMERICA,)
)
Plaintiff,)
) Case No. 2:20-cr-20187
vs.)
) Honorable George Caram Steeh
BILLY ARNOLD,)
)
Defendant.)

DEFENDANT'S PROPOSED VOIR DIRE

Defendant Billy Arnold, by counsel, submits the following *voir dire* questions for the jury panel.

1. Some of the evidence in this case will concern locations in the City of Detroit, in particular the East side of Detroit. Do you, or does any member of your family, live or work near this area?
2. Do you feel that you could not sit fairly and impartially as a juror in a case involving charges like the charges in this case?
3. Do you have any ideas or prejudices that would prevent or hinder you from following the instructions that I will give you as to the law?
4. The trial will include evidence relating to murders of individuals in Detroit. Do you believe that evidenced will interfere with your ability to provide a fair trial?

5. Have you or has any member of your family or anyone close to you ever been injured by use of a firearm?

6. Have you or anyone close to you ever been subject of an investigation by any law enforcement agency?

7. Do you have a problem with your hearing or vision that would prevent you from giving full attention to all of the evidenced at this trial?

8. Do you have any difficulty in understanding or reading English?

9. Do you have any special medical problems that might interfere with your service as a juror in this case?

10. How much of a problem do you think gangs are in society?

11. Do you own any firearms?

12. Do you believe that any racial group (African Americans, for example) is more likely to engage in criminal behavior?

13. Do you believe the defendants are probably guilty or matters would not have gotten this far?

14. Are you in any way fearful of the man on trial?

15. Do you have any hesitation or unwillingness to accept the rules of law as I state them?

16. Can you honestly say you would be fair and impartial if you learned the defendant had been previously convicted of a serious crime?

17. Please name a living public figure that you admire.

Respectfully submitted,

/s/ Maria Mannarino

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